

# WTC

**Leading Telecommunications Through the 21st Century**  
1009 Lincoln Ave - P.O. Box 25 - Wamego, Kansas 66547  
www.wamego.net

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February 2, 2006

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: Certification of CPNI Filing (February 2, 2006)  
Docket No. EB-06-TC-060

Dear Ms. Dortch:

In compliance with the FCC's Public Notice, DA 06-223 (released on January 30, 2006), Wamego Telephone Company, Inc., hereby files its report providing its annual CPNI officer certification and accompanying statement explaining how its operating procedures ensure compliance with the FCC's CPNI rules.

Should you have any questions or need additional information, please contact the undersigned.

Sincerely,

Steven L. Sackrider  
General Manager

cc: Mr. Byron McCoy (FCC)  
Best Copy and Printing, Inc.

### Certification of Compliance

I, Steven L. Sackrider, being of lawful age duly sworn, on my oath state that I am General Manager (an officer) of Wamego Telephone Company, Inc. and as agent for Wamego Telephone Company, Inc., state that I am authorized to execute this certification on behalf of Wamego Telephone Company, Inc., and that based upon my personal knowledge that the facts set forth in this certification are true to the best of my knowledge, information and belief. On that basis I certify that Wamego Telephone Company, Inc., has established operating procedures that are adequate to ensure compliance with the rules of the Federal Communications Commission set forth in 47 CFR S64.2001 through 64.2009.

A statement explaining how the operating procedures of Wamego Telephone Company, Inc. ensure that it is in compliance with these rules of the FCC is attached.

Wamego Telephone Company, Inc.

By: Steven L. Sackrider (signature)  
Its: General Manager



Date: 11/3/05

Annual Statement of Explanation – CPNI Operating Procedures

This statement explains how the operating procedures of Wamego Telephone Company, Inc. are in compliance with 47 CFR S64.2001-64.2009.

Wamego Telephone Company, Inc. uses CPNI only in compliance with S64.2005. Personnel employed in the company's marketing and billing sections are provided with an explanation of what information may be shared to market services to customers and what information may not be shared pursuant to 47 CFR S64.2005.

The company uses the written opt-out notice and approval procedure set forth in 47 CFR S64.2007 for broader use of CPNI.

STATE OF: Kansas

SS.

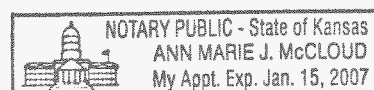
County of: Pottawatomie

On this 3<sup>rd</sup> day November, 2005, before me, the undersigned, a Notary Public in and for the State of Kansas, dully commissioned and sworn, personally appeared Steven L. Sackrider, to me known to be the General Manager of Wamego Telephone Company, Inc., the corporation that executed the within and foregoing instrument, and acknowledged said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he/she is authorized to execute said instrument, and that the seal affixed is the corporate seal of said corporation.

Witness my hand and official seal hereto affixed the day and year first above written.

Ann Marie J. McCloud  
Ann Marie J. McCloud  
[Printed Name]

Notary Public in and for the  
State of Kansas,  
Residing at Wamego, KS.  
My commission expires  
Jan 15, 2007.



**CPNI Operating Procedures**  
**Wamego Telephone Company, Inc.**

1. WTC will use the written “opt-out” CPNI approval method.
  - WTC will wait 30 day (minimum) after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. WTC may provide a longer period in some cases. The waiting period will be clearly noted on the written notification. The period will run a minimum of 33 days from the date on which the notification was mailed.
  - If WTC decides to do an electronic notification, the notification period will begin from the date on which notification is sent.
  - Notice will be given every two years on this opt-out method.
  - No e-mail notifications will be used for the opt-out method.
2. WTC will check the box in Customer Master indicating that all customers who have chosen from the opt-out method will allow use of CPNI to be used. If the box in Customer Master is NOT checked, this will indicate that the customer has NOT chosen to have their CPNI information shared with the company or any of its subsidiaries and no marketing can be done without their further approval.
3. WTC customer service representatives may use oral notice for those who have NOT chosen to have their CPNI information shared on a one-time basis for both inbound and outbound customer telephone contacts for the duration of the call. The customer must be asked if they consent to have their CPNI shared only during this call. If the customer gives verbal approval, then the CS representative may use the CPNI information to market products not currently used by this customer. The CS service representative must put into the comment section of CM that the customer DID consent to the use of CPNI.
4. Any use of individually identifiable CPNI to market services related to those which the customer already subscribes (i.e., a free month of caller ID to local service customers) does NOT require notice, opt-out or consent. However, to use CPNI to market an unrelated communications service, there must be adequate notice given thru the opt-out procedure, OR the CS representative must obtain a one-time approval from the customer to use CPNI. (e.g. using information about individual local customer’s calling habits to market our long distance or Internet offering)
5. Any marketing promotion which WTC promotes (i.e. discount on Internet service via a bill insert) to the whole population does NOT apply to CPNI rules (no advance notice, ability to opt-out or express consent is required) because we are not using individually identifiable customer information.

6. Any marketing promotion to ALL of the customers that live on a particular street or part of town does NOT require notice and/or consent because addresses are not considered CPNI.
7. WTC will provide the FCC written notice within five business days of any instance where the opt-out mechanism did not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.
8. The CS supervisor will review the process for CPNI with each CS representative on a yearly basis and document this.
9. The General Manager will sign a compliance certificate on an annual basis stating that the company has established operating procedures that are adequate to insure compliance. An accompanying statement must explain how its operating procedures ensure that it is, or is not, in compliance with the rules.